

1 Richard Edward Haskin (Nevada Bar No. 11592)
2 **GIBBS GIDEN LOCHER TURNER & SENET**
3 1140 N. Town Center Drive, Suite 300
Las Vegas, NV 89144
Telephone: (702) 836-9800

4 Nathan D. O'Malley (California Bar No. 212193 – *Pro Hac Vice Application Pending*)
Peter J. Diedrich (California Bar No. 101649 – *Pro Hac Vice Application Pending*)
5 Marcio Vasconcellos (California Bar No. 313849 – *Pro Hac Vice Application Pending*)
MUSICK, PEELER & GARRETT LLP
6 624 South Grand Avenue, Suite 2000
Los Angeles, California 90017-3383
7 Telephone: (213) 629-7600
Facsimile: (213) 624-1376

8 Attorneys for PAYVISION B.V., a Netherlands limited liability company
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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA, SOUTHERN DIVISION**

12 T1 PAYMENTS LLC, a Nevada limited
liability company,

13 Plaintiff,

14 vs.
15 BEYOND WEALTH PTE LLC, a Utah
limited liability company,

17 Defendant.

CASE No. 2:20-CV-01405-JCM-VCF

**STIPULATION TO EXTEND TIME FOR
BEYOND WEALTH PTE LLC TO
RESPOND TO PAYVISION B.V.'S
MOTION TO DISMISS FIRST AMENDED
COUNTERCLAIM**

18 BEYOND WEALTH PTE LLC, a Utah
19 limited liability company,

20 Counterclaimant,

21 vs.

22 T1 PAYMENTS LLC, a Nevada limited
liability company, et al.,

23 Counterclaim-Defendants.

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Case No. 2:20-CV-01405-JCM-VCF

STIPULATION TO EXTEND TIME FOR BEYOND WEALTH PTE LLC TO RESPOND TO PAYVISION B.V.'S
MOTION TO DISMISS FIRST AMENDED COUNTERCLAIM

1 Counterclaimant Beyond Wealth PTE LLC, a Utah limited liability company (“Beyond
 2 Wealth”) and Counterclaim-Defendant Payvision B.V., a Dutch limited liability company
 3 (“Payvision”), through their respective counsel, hereby stipulate and agree as follows:

4 WHEREAS, on November 9, 2020, Payvision filed a motion to dismiss (“Motion”)
 5 Beyond Wealth’s First Amended Counterclaim (“FAC”);

6 WHEREAS, pursuant to Local Rule LR 7-2, Beyond Wealth has fourteen days to file a
 7 response to the Motion, which would be Monday, November 23, 2020;

8 WHEREAS, on November 19, 2020, Beyond Wealth has presented Payvision with
 9 potential settlement options, which Payvision will require certain time to review;

10 WHEREAS, on November 20, 2020, counsel for Beyond Wealth and counsel for
 11 Payvision agreed to extend the time for Beyond Wealth to respond to the Motion for a period of
 12 two weeks, until December 7, 2020, and for Payvision to reply to Beyond Wealth’s response until
 13 December 14, 2020;

14 NOW, THEREFORE, Beyond Wealth and Payvision hereby stipulate and agree as
 15 follows:

- 16 1. Beyond Wealth’s response to the Motion shall be due December 7, 2020;
- 17 2. Payvision’s reply to Beyond Wealth’s response to the Motion shall be due
 December 14, 2020;
- 19 3. All discovery and Rule 26 disclosure deadlines between Beyond Wealth and
 Payvision are also continued for a period of two weeks.

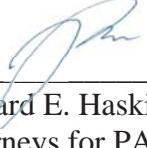
21 DATED: November ___, 2020

DATED: November 23, 2020

22 GIBBS GIDEN LOCHER TURNER
 SENET & WITTBRODT LLP

WELLMAN & WARREN LLP

24 By: _____

25 
 Richard E. Haskin, Esq.
 Attorneys for PAYVISION B.V., a
 Netherlands limited liability company.

/s/

By: _____

26 Scott Wellman
 Attorneys for Beyond Wealth PTE LLC, a
 Utah limited liability company.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA, SOUTHERN DIVISION

T1 PAYMENTS LLC, a Nevada limited liability company,

Plaintiff,

vs.

BEYOND WEALTH PTE LLC, a Utah limited liability company,

Defendant.

BEYOND WEALTH PTE LLC, a Utah limited liability company,

Counterclaimant,

vs.

T1 PAYMENTS LLC, a Nevada limited liability company, et al.,

Counterclaim-Defendants.

CASE No. 2:20-CV-01405-JCM-VCF

[PROPOSED] ORDER GRANTING STIPULATION TO EXTEND TIME FOR BEYOND WEALTH PTE LLC TO RESPOND TO PAYVISION B.V.'S MOTION TO DISMISS FIRST AMENDED COUNTERCLAIM

1 This Court, having considered the foregoing stipulation of the parties and finding good
2 cause therefore, **IT IS ORDERED** that:

- 3 1. Beyond Wealth's response to Payvision's pending Motion to Dismiss shall be due
4 December 7, 2020;
- 5 2. Payvision's reply to Beyond Wealth's response to the Motion shall be due
6 December 14, 2020;
- 7 3. All discovery and Rule 26 disclosure deadlines between Beyond Wealth and
8 Payvision are also continued for a period of two weeks.

9 DATED: December 2, 2020.

10 *James C. Mahan*
11 _____
12 UNITED STATES DISTRICT JUDGE